

EXHIBIT B

From: Caroline Small csmall@dslawpc.com

Subject: Re: Paul v. Findeisen, et al.

Date: January 31, 2025 at 4:22 PM

To: Jeffrey Neiman jneiman@mnrlawfirm.com, Jason Mays jmays@mnrlawfirm.com

Cc: Erin Green egreen@dslawpc.com, andy.phillips@mwpp.com, shannon.timmann@mwpp.com, rcedillo@lawdcm.com, Jason Davis jdavis@dslawpc.com, Rachel Garza Rgarza@dslawpc.com, Danielle Grote dgrote@dslawpc.com, Jasmine Capetillo jcapetillo@dslawpc.com, Dela Valdez dvaldez@dslawpc.com, Hailey Cho hcho@dslawpc.com

We will make you opposed / you explain your position in your response.

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From: Jeffrey Neiman <jneiman@mnrlawfirm.com>

Sent: Friday, January 31, 2025 2:19:23 PM

To: Caroline Small <csmall@dslawpc.com>; Jason Mays <jmays@mnrlawfirm.com>

Cc: Erin Green <egreen@dslawpc.com>; andy.phillips@mwpp.com

<andy.phillips@mwpp.com>; shannon.timmann@mwpp.com

<shannon.timmann@mwpp.com>; rcedillo@lawdcm.com <rcedillo@lawdcm.com>; Jason

Davis <jdavis@dslawpc.com>; Rachel Garza <Rgarza@dslawpc.com>; Danielle Grote

<dgrote@dslawpc.com>; Jasmine Capetillo <jcapetillo@dslawpc.com>; Dela Valdez

<dvaldez@dslawpc.com>; Hailey Cho <hcho@dslawpc.com>

Subject: RE: Paul v. Findeisen, et al.

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Caroline,

As a professional courtesy, and at the request of your team, we did not pursue our discovery while you and your colleagues got up to speed on the case. Then, our filing of the Motion, itself, was delayed for weeks by our inability to get a straightforward response from your team as to Defendants' position on the underlying dispute. Still, upon filing the Motion we agreed to a reasonable extension of the response deadline. But now we are receiving yet another extension request on the day of the already-extended deadline. We will always try and be reasonable and accommodating about extension requests when we can be, but given this context we cannot agree to another extension here—absent you telling us that the trial and your travel were unknown at the time of your original extension request.

We therefore ask that you add our position to your Motion as follows: "Although Plaintiff did not oppose Defendants' initial extension request, and is generally accommodating about reasonable extension requests, Plaintiff opposes Defendants' second extension request. Defendants made the request on the day of their already-extended deadline, citing professional obligations that were known at the time of their original request. Additionally, Plaintiff submits that he had to hold off on filing his Motion for several weeks because of Defendants' delays in the conferral process, and at this juncture Defendants' repeated delays are impacting his ability to move this case forward."

Jeff



Jeffrey A. Neiman

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From: Caroline Small <csmall@dslawpc.com>
Sent: Friday, January 31, 2025 12:51 PM
To: Jeffrey Neiman <jneiman@mnrlawfirm.com>; Jason Mays <jmays@mnrlawfirm.com>
Cc: Erin Green <egreen@dslawpc.com>; andy.phillips@mwpp.com;
shannon.timmann@mwpp.com; rcedillo@lawdcm.com; Jason Davis
<jdavis@dslawpc.com>; Rachel Garza <Rgarza@dslawpc.com>; Danielle Grote
<dgrote@dslawpc.com>; Jasmine Capetillo <jcapetillo@dslawpc.com>; Dela Valdez
<dvaldez@dslawpc.com>; Hailey Cho <hcho@dslawpc.com>
Subject: RE: Paul v. Findeisen, et al.
Importance: High

Jeff,

It occurred to me that we didn't expressly discuss the deadline for us to respond to the pending MTC in our phone call – which is due today. We intended to ask for an extension of the deadline in light of my international travel and Jason's trial, to February 14 so it lines up with the other deadlines. We will be filing a MFE today.

For purposes of the COC, are you agreeable to that extension?

Thanks,
Caroline

From: Jeffrey Neiman <jneiman@mnrlawfirm.com>
Sent: Friday, January 31, 2025 8:26 AM
To: Jason Mays <jmays@mnrlawfirm.com>
Cc: Erin Green <egreen@dslawpc.com>; andy.phillips@mwpp.com;
shannon.timmann@mwpp.com; rcedillo@lawdcm.com; Jason Davis
<jdavis@dslawpc.com>; Caroline Small <csmall@dslawpc.com>; Rachel Garza
<Rgarza@dslawpc.com>; Danielle Grote <dgrote@dslawpc.com>; Jasmine Capetillo
<jcapetillo@dslawpc.com>; Dela Valdez <dvaldez@dslawpc.com>; Hailey Cho
<hcho@dslawpc.com>
Subject: Re: Paul v. Findeisen, et al.

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Please let us know by the COB today if this was an oversight or if you intend to assert privilege over the text string and if so, why, given your position on the emails?

Thank you.

Jeffrey A. Neiman
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On Jan 30, 2025, at 5:32 PM, Jason Mays <jmays@mnrlawfirm.com> wrote:

Thank you. We note that your letter does not account for your privilege assertion over Mr. Findeisen's *text messages* with Mr. Kerkher (which is reflected at Row 16 of your privilege log of text messages), only his emails. Was that an oversight? Please confirm that this privilege assertion is being withdrawn, as well, and assuming that is the case please produce those text messages. Thanks, Jason

From: Erin Green <egreen@dslawpc.com>
Sent: Thursday, January 30, 2025 5:07 PM
To: andy.phillips@mwpp.com; shannon.timmann@mwpp.com; Jeffrey Neiman <jneiman@mnrlawfirm.com>; Jason Mays <jmays@mnrlawfirm.com>; rcedillo@lawdcm.com
Cc: Jason Davis <jdavis@dslawpc.com>; Caroline Small <csmall@dslawpc.com>; Rachel Garza <Rgarza@dslawpc.com>; Danielle Grote <dgrote@dslawpc.com>; Jasmine Capetillo <jcapetillo@dslawpc.com>; Dela Valdez <dvaldez@dslawpc.com>; Hailey Cho <hcho@dslawpc.com>
Subject: Paul v. Findeisen, et al.

Dear Counsel,

Please see the attached correspondence on behalf of Caroline Newman Small regarding the above referenced matter.

Additionally, below is the Dropbox link referenced in the attached

correspondence:

[2025 01-30 Defendants' Supplemental Production](#)

Thank you for your attention and please contact our office if you have any questions.

**DAVIS
SANTOS**

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Trial Specialist

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